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K R A S K I N, L E S S E & C O S S O N, L L C  
ATTORNEYS AT LAW  
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

**ORIGINAL**

2120 L Street, N W., Suite 520  
Washington, D C 20037

Telephone (202) 296-8890  
Telecopier (202) 296-8893

**RECEIVED**

December 10, 2003

DEC 10 2003

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Federal Communications Commission  
Office of Secretary

Re: Petition for Clarification or, in the Alternative, Waiver, filed November 26, 2003  
CC Docket No. 96-128

Dear Ms. Dortch:

On behalf of the noted companies participating in the above-captioned Petition, we are transmitting the original signed declarations for the following companies:

Adams Telephone Co-Operative  
Brantley Telephone Company, Inc.  
Chibardun Telephone Cooperative, Inc.  
Cimarron Telephone Company  
Duo County Telephone Cooperative  
Grand River Mutual Telephone Corporation

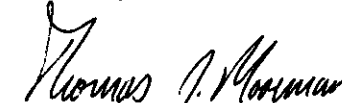
LaFourche Telephone Company LLC  
Margaretville Telephone Company, Inc.  
North Central Telephone Cooperative, Inc.  
SEI Communications  
Stayton Cooperative Telephone Co.  
United Telephone Company

When either the Petition or supplement thereto was filed, the declarations bearing a facsimile signature were filed with the Commission as an attachment

Please associate this attachment with the captioned Petition.

Should you have any questions, please contact this office.

Sincerely,



Thomas J. Moorman

Attachments

No. of Copies rec'd  
List ABCDE

014

## DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY


The undersigned company is a rural telephone company that received a memorandum dated August 29, 2003 together with an attached invoice from APCC Services, Inc. on behalf of various Payphone Service Providers ("PSPs") that referenced the Federal Communications Commission decision from October, 2002 addressing compensation obligations to PSPs.

When dial around calls and subscriber toll-free calls are made from payphones located in the Company's service area, we automatically route those calls from our central office to the toll provider (the Regional Bell Operating Company or other Interexchange Carrier) assigned the access code or the 8XX number being dialed. This automatic routing is triggered by the end user dialing a "1" and occurs even where the call is ultimately terminated to an end user located within our service area. Once routed to the toll provider, however, the toll provider controls the routing of the call and how that call will be terminated. Unlike the regional Bell Operating Company, our company is not an intraLATA toll provider.

Accordingly, when calls are made from any pay station in our service area, it is not possible for our company to handle a call that is compensable. Unlike the regional Bell Operating Companies or other local exchange carriers that provide intraLATA services on a compensable basis, our company provides only originating access service to other carriers. With respect to the traffic associated with the invoice received from APCC, we conclude that the compensable calls were handled by the intraLATA toll provider that is assigned to the paystation; no compensable calls were handled by our company.

I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date: 11/25/03

  
(signature)

James W. Broecker Jr.  
(printed name)

Manager  
(Title)

Company Name: Adams Telephone Co. Cooperative

Company Address: PO Box 217

Golden, IL 62339

## DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

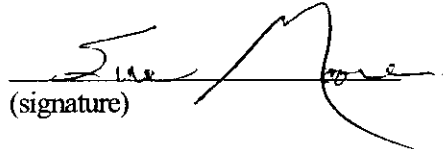
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I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date: November 21, 2003

  
(signature)

Sue Moore  
(printed name)

Office Manager  
(Title)

Company Name: Brantley Telephone Company, Inc.

Company Address: P.O. Box 255

Nahunta, GA 31553

**DECLARATION OF PETITIONING  
INCUMBENT RURAL TELEPHONE COMPANY**

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I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration

Date: 11-24-03

Ricky S. Vergin  
(signature)

Ricky S. Vergin  
(printed name)

CEO  
(Title)

Company Name: Chibardun Telephone Cooperative, Inc.

Company Address 110 N 2nd Ave  
Dallas TX 75201

## DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

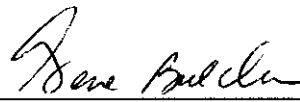
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Date: 11-25-03

  
(signature)

GENE BALDWIN  
(printed name)

GM  
(Title)

Company Name: Cinnamon Telephone Company

Company Address: P.O. Box 140

101 Cinnamon Street

MANNFORD, CT 06444

## DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: 11/21/03

[Signature]  
(signature)

Day L. Hammond  
(printed name)

controller  
(Title)

Company Name:

Duo County Telephone

Company Address:

PO Box 80

Jamesburg, NY

42629

## DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date. 11-24-03

Kenneth P. Roberts  
(signature)

KENNETH P. ROBERTS  
(printed name)

CONTROLLER  
(Title)

Company Name. GRAND RIVER MUTUAL TELEPHONE CORP.

Company Address. 1001 KENTUCKY ST.

PRINCETON, MO 64673

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## DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

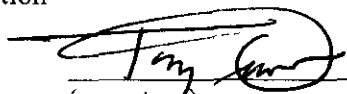
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I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration

Date: 12-05-03

  
(signature)

Tony Duet  
(printed name)

President  
(Title)

Company Name: LA Fourche Telephone Company LLC

Company Address P.O. Box 188

LAROSE

LOUISIANA 70373



## DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date:

11/24/03

(signature)

Douglas Hinkley

(printed name)

Gen Mgr

(Title)

Company Name

Mangartville Telephone Co Inc

Company Address:

Box 260

Mangartville NY 12455

## DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

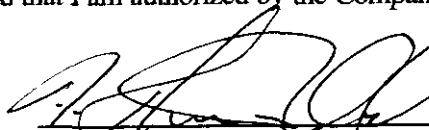
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Date: 11/24/03

  
(signature)

F. Thomas Rowland  
(printed name)

President + CEO  
(Title)

Company Name: North Central Telephone Coop. Inc.

Company Address: 872 E. Hwy. 52 Bypass  
P.O. Box 70  
Lafayette, TN 37083

## DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: 11-24-03

G. Ray Lawrence  
(signature)

G. Ray Lawrence  
(printed name)

OPERATION MGR.  
(Title)

Company Name: SEI COMMUNICATIONS

Company Address: 14005 U.S. HIGHWAY 50E.  
DILLSBORO IN 47018

## DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY

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Date: 11/24/03

Don Lawrence  
(signature)

DON LAWRENCE  
(printed name)

PRESIDENT  
(Title)

Company Name: STAYTON COOPERATIVE TELEPHONE CO.

Company Address: P.O. Box 477  
STAYTON, OR 97383

## DECLARATION OF PETITIONING INCUMBENT RURAL TELEPHONE COMPANY


The undersigned company is a rural telephone company that received a letter dated March 10, 2003 together with an attached invoice from APCC Services, Inc. on behalf of various Payphone Service Providers ("PSPs") that referenced the Federal Communications Commission decision from October, 2002 addressing compensation obligations to PSPs.

When dial around calls and subscriber toll-free calls are made from payphones located in the Company's service area, we automatically route those calls from our central office to the toll provider (the Regional Bell Operating Company or other Interexchange Carrier) assigned the access code or the 8XX number being dialed. This automatic routing is triggered by the end user dialing a "1" and occurs even where the call is ultimately terminated to an end user located within our service area. Once routed to the toll provider, however, the toll provider controls the routing of the call and how that call will be terminated. Unlike the regional Bell Operating Company, our company is not an intraLATA toll provider.

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I do hereby declare under penalties of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief, and that I am authorized by the Company indicated below to provide this Declaration.

Date: 12/4/2003

  
(signature)

HERBERT R. BIVENS  
(printed name)

GEN. MANAGER  
(Title)

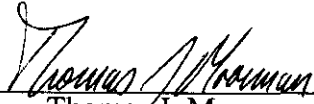
Company Name: UNITED TELEPHONE COMPANY

Company Address: P.O. BOX 38

CHAPEL HILL, TN 37034

**CERTIFICATE OF SERVICE**

I, Thomas J. Moorman, of Kraskin, Lesse & Cosson, LLC, 2120 L Street, NW, Suite 520, Washington, DC 20037, do hereby certify that a copy of the foregoing letter and attachments regarding the "Petition for Clarification or, in the Alternative, Waiver" was served on this 10th day of December 2003, to the following parties:

  
\_\_\_\_\_  
Thomas J. Moorman

William Maher, Chief  
Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554  
(Hand Delivered)

Qualex International  
445 12<sup>th</sup> Street, SW  
Room CY-B402  
Washington, DC 20554  
(Hand Delivered)

Robert F. Aldrich  
Dickstein Shapiro Morin & Oshinsky, LLP  
2101 L Street, N.W.  
Washington, D.C. 20037-1526